

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C.

Wednesday, August 5, 1998

The testimony of TIM K. LYNN was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997 commencing at 4:01 p.m. before:

TIMOTHY SUSANIN  
Associate Independent Counsel  
EDWARD PAGE  
Associate Independent Counsel  
MARY ANNE WIRTH  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
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- 1 you some rights and some obligations that you have as a  
2 witness before the grand jury.  
3 A Okay.  
4 Q First of all, Mr. Lynn, you have the right to  
5 counsel.  
6 While you do not have the right to have counsel  
7 here in the grand jury room with you, you do have the right  
8 to have an attorney outside, and you can stop these  
9 proceedings and go outside and talk with your attorney if you  
10 need to. Do you understand that right, sir?  
11 A Yes.  
12 Q Do you have a personal attorney, a private lawyer,  
13 hired by you here today?  
14 A No.  
15 Q Do you have any attorney representing you today?  
16 A Other than the Secret Service people that are  
17 standing out there, no.  
18 Q So there are lawyers from the Secret Service here?  
19 A Tom Doherty and those guys are, I guess, the legal  
20 representation that's here, as far as anything that has to do  
21 with me.  
22 Q Do you know how many Secret Service lawyers, other  
23 than Mr. Doherty, are outside?  
24 A I guess -- what's the black guy's name?  
25

## PROCEEDINGS

1 Whereupon,

2 TIM K. LYNN

3 was called as a witness and, having been first duly sworn by  
4 the Foreperson of the Grand Jury, was examined and testified  
5 as follows:

## EXAMINATION

BY MR. SUSANIN:

- Q Good afternoon, Mr. Lynn. How are you doing?  
Could you state your name for the record, sir?  
A I'm Tim K. Lynn.  
Q And spell your last name for us, Mr. Lynn.  
A L-y-n-n.  
Q All right. We met briefly outside, sir. Let me  
reintroduce myself. My name is Timothy Susanin. I'm with  
the Independent Counsel's Office.  
To my right is my colleague, Ed Page. Across the  
table from us is the court reporter. And the rest of the  
ladies and gentleman in the room, including the two across  
from you, are ladies and gentlemen of the grand jury.  
A Okay.  
Q And, as you know, I'm going to be asking you some  
questions this afternoon in front of the members of the grand  
jury.  
Before I do that, let me briefly go through with

- BY MR. PAGE:  
Q Matt Dates?  
A Yeah, Matt Dates, I guess. He's the only other  
one.  
BY MR. SUSANIN:  
Q Just those two?  
A Mm-hmm.  
Q All right. You let us know if you want to stop and  
speak with either Mr. Dates or Mr. Doherty.  
A Okay.  
Q You also, as you know, just took an oath. You are  
under oath here before the grand jury.  
You have the responsibility to tell the truth  
before the ladies and gentlemen of the grand jury, and you  
need to know that part of that responsibility is not saying  
you don't know if you do know, not otherwise misleading the  
ladies and gentlemen of the grand jury, and not saying you  
don't remember if you do remember. Do you understand that,  
sir?  
A Yes.  
Q Under the Fifth Amendment to the Constitution of  
the U.S., you have a right against self-incrimination.  
In real language, what that means is, if I were to  
ask you a question, and the truthful answer to that question  
would tend to incriminate you, you have a right not to answer